



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

January 31, 2022

**BY ECF**

The Honorable Lorna G. Schofield  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Dennis*, 20 Cr. 623 (LGS)**


Dear Judge Schofield:

The parties respectfully submit this joint letter pursuant to the Court's order, dated December 6, 2021 (Doc. No. 17), requesting that the parties provide the Court with an update on the status of any outstanding discovery. To date, the Government has made two large productions to the defense, including productions containing three email accounts and the defendant's phone, all of which the Government seized pursuant to search warrants. The outstanding discovery currently consists of (1) the subset of data that the Government has identified from those accounts and phone based on the Government's responsiveness review, and (2) additional records from the FBI's case file as of January 14, 2022. The latter records will be produced this week. The Government is still conducting its responsiveness review of the warrant returns, which has taken some time given not only the volume of data but also because of the privilege issues that exist given that the defendant is an attorney. Indeed, because the defendant is an attorney, there are certain filter procedures that the Government has had to implement and carry out in connection with each responsiveness review. The Government anticipates producing a large set of the identified data within the next three to four weeks. Defense counsel advises that, pending receipt and review of the forthcoming production(s), the defense reserves the right to serve additional discovery demands and/or requests for the identification of *Brady* and *Giglio* material on the Government.

Finally, the parties respectfully request that the Court enter the enclosed proposed protective order governing discovery in this case.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by:   
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